STATE OF MISSOURI

Mel Carnahan, Governor • Stephen M. Mahfood, Director

7116

DEPARTMENT OF NATURAL RESOURCES

August 10, 1998

Mr. Roger Thomas Semcor Corporation 5432 Highland Park St. Louis, MO 63110

Dear Mr. Thomas:

A compliance evaluation inspection of Semcor Corporation (Semcor), located at the above address, was conducted by Ms. Doris Mann of my staff on July 27, 1998. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

Semcor is currently registered as a small quantity hazardous waste generator, though, the inspection revealed that Semcor no longer generates hazardous waste and none was observed on site at the time of the inspection. Annual manifest summary reports for 1996, 1997 and 1998 were reviewed. Semcor's last shipment of hazardous waste was 72 pounds of waste mercury contained in fluorescent bulbs in March 1997. No hazardous waste violations were found during the inspection.

If Semcor does not intend to generate hazardous waste in the immediate future, the facility may request its hazardous waste numbers be given inactive status. Inactive status indicates the facility no longer generates or stores hazardous waste. Semcor may update its Notification of Regulated Waste Activity (NORWA) form with the Department to indicate inactive status or submit a letter requesting the facility's hazardous waste identification numbers be inactivated. If the facility begins generating hazardous waste in the future, the waste numbers can be returned to active status. Semcor should decide whether to maintain their hazardous waste numbers in an active status. Active status requires continued submittal of quarterly or annual manifest summary reports, depending on the number of hazardous waste shipments.

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AUG 1 2 1998

HAZARDOUS WASTE PROGRAM MISSOURI DEPARTMENT OF NATURAL RESOURCES

R00136441 RCRA RECORDS CENTER Gemcor Corporation (HWP) August 10, 1998 Page 2

Please submit a written response no later than <u>September 14, 1998</u>, explaining what course of action Semcor intends to take. Please direct the response to Ms. Mann's attention. You should also forward a copy of your response to Ms. Kathy Flippin, Unit Chief - Enforcement Section, Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102. Should you have any questions or concerns regarding this report or hazardous waste management, please contact Ms. Mann at (314)301-7100.

Sincerely,

ST. LOUIS REGIONAL OFFICE

ASPEL

Robert S. P. Eck Regional Director

RSPE/DEM/al

Enclosure

c: Kathy Flippin, HWP, Enforcement



MISSOURI DEPARTMENT OF ATURAL RESOURCES HAZARDOUS WASTE PROGRAM SMALL QUANTITY GENERATOR INSPECTION RECORD AND CHECKLIST

CESQY

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SOG-INSP

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE< 1000 Kg (2,200 lbs. or approximately 5 drums)							
NAME SEMCOT CORP.	DATE 7/27/	98	EPA ID NUMBER MOD 985768993				
ADDRESS 432 Highland Park	RR NO N/F	1	MO ID NUMBER 01/960				
CITY ST. LOUIS COUNTY	of employees	YEARS AT SITE	TELEPHONE NUMBER 37/-4777				
FACILITY REPRESENTATIVE(S), TITLE(S) ROGER THOMAS Mgn. of Operations							
DATE(S) OF LIST INSPECTION(S)	-						
Barrios .	NGITUDE						
DEG MIN SEC	DEG _	MIN	SEC				
DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT	Y 1 41.						

Semcor is a fabricating distributor of metal, rubber and teflon lined hoses, belts and pipes. Semcor consists of one building and operates one weekday shift. Operations include cutting, welding and crimping. Semcor currently uses Brulin Aqua-Safe cleaner which is non-hazardous and replaced Trichloroethylene. Semcor is registered as a small quantity generator but does not currently generate hazardous waste. No hazardous waste was observed on site. Semcor has submitted annual manifest summary reports for 1996, 1997 and 1998. Semcor was evaluated as a conditionally exempt generator and no violations were noted during the inspection. Semcor may inactivate its hazardous waste numbers.

			8
#			
VASTE STREAMS			
DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA WASTE CODE(S)	DISPOSITION
None Currently			,
4.			
3.			
i			
5.	· · · · · · · · · · · · · · · · · · ·		
0 780-1602 (9-97)			SQG PAGE 1 OF

A. G	ENERAL			
The same of the sa	Registered as a hazardous waste generator - Section 260.380.1 (1)			
	RSMo and 10 CSR 25-5.262 (2)(A).	1	GGR	COMMENTS
2. [4	Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1	GGR	****
3. 🗷	Utilizes a licensed hazardous waste transporter - Section 260.380.1(5) RSMo.	1	GGR	
4. 🗗	Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo.	1	GGR	*
5. Œ	Facility does not operate as a TSD - Section 260.390(1) RSMo.	1	GGR	
	PART 1: WALK-THROUG	H IN	SPECT	TION
B. P	RETRANSPORT, CONTAINERIZATION & STORAGE			
1. 🗆	Storage does not exceed 180 days 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d) or 270 days if transported > 200 miles - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	1	GSQ	No HW stored on site
2. 🗆	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171.	1	GPT	No AW DIOTES ON SILE
3. 🗆	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172.	1	GPT ⁻	
4. 🗆	Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a).	1	GPT	
5. 🗆	Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c).	1	GPT	·. ·
6. 🗆	Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I) 7 and 8.	2	GOR	
7. 🗆	Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	2	GOR	*
8. 🗆	Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).	2	GPT	
9. 🗆	Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.D.(II).	2	GOR	
10. 🗆	Containers clearly marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	2	GPT	
	Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.C.(II) referencing 40 CFR 265.174.	2	GPT	
12.	Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.C.(II) referencing 40 CFR 265.195.	2	GOR	
13. 🗆	Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35.	2	GPT	
	Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33.	2	GPT	
15. 🗆	"No Smoking" signs conspicuously placed by ignitable or reactive wastes- 10 CSR 25-5.262(2)(C)2.F.(II).	2	GOR	,
C. S	ATELLITE ACCUMULATION			
1. 🗆	Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).	1	GPT	COMMENTS
2. 🗆	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.	-1	GPT	no Hw on site
3. 🗆	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.	1	GPT	
4.	Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	1	GPT	
5.	Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	1	GPT	
6.	5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3.	2	GOR	
MO 780-1	602 (9-97)			. SQG PAGE 2 OF

•							
.7. Stored in satellite areas less			2	GOR	COMMENTS		
D. PREPAREDNESS AND PREV	ENTION AND EMERGEN	ICY PROCED	URES	3		-	
1. Facility operated and maintangenergency - 10 CSR 25-5.2 referencing 40 CFR 265.31.	nined to minimize the pos	sibility of an	1	GPT	COMMENTS		
2. Adequate and proper spill equipment available (fire bl. etc.) and properly tested incorporating 40 CFR 262.3 amended by 10 CSR 25-5.262(ankets, respirators, SCBA, and maintained - 10 CSF 4(d)(4) referencing 40 CF	absorbents, 25-5.262(1)	2	GPT			
3. Adequate water supply and 5.262(1) incorporating 40 CFR and (d).			2	GPT			
4. Communication and emergen CSR 25-5.262(1) incorporating 265.33.			2	GPT	COMMENTS		
5. Emergency coordinator's nar - 10 CSR 25-5.262(1) incorpora	ne and phone number post ating 40 CFR 262.34(d)(5)(ii).	ed near phone	2	GSQ	×		
6. Telephone number of fire dep 5.262(1) incorporating 40 CFR	eartment posted near phone 262.34(d)(5)(ii).	- 10 CSR 25-	2	GSQ			
7. Location of fire extinguisher phone - 10 CSR 25-5.262(1) ir	acorporating 40 CFR 262.34(d)(5)(ii).	2	GSQ			
8. Employees familiar with was: 10 CSR 25-5.262(1) incorporat	ing 40 CFR 262.34(d)(5)(iii).		2	GSQ			
9. Device in the hazardous was emergency assistance - 10 262.34(d)(4) referencing 40 CF	CSR 25-5.262(1) incorpora R 265.34(a).	ating 40 CFŘ	2	GPT			
10. ☐ Telephone or two-way radio fire or police dept 10 262.34(d)(4) referencing 40 CF E. SQG TANKS	CSR 25-5.262(1) incorpora		2	GPT			
TANK DESIGNATION	CONTENTS	CAPA	CITY	,	CONTAINMENT AG	E	
1. N/A							
2.							
3.		<u>;</u>					
 Uncovered tanks have 2 ft. fr 25-5.262(1) incorporating 40 265.201(b)(3). 	eboard or containment system - 10 ČSR CFR 262.34(d)(3) referencing 40 CFR			GPT	COMMENTS		
proper by-pass system - 10	ontinuously fed tanks equipped with a feed cut-off system or a oper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 2.34(d)(3) referencing 40 CFR 265.201(b)(4).			GPT			
	Waste and/or treatment method is compatible with tank - 10 CSR 25-35.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2).			GPT			
4. Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)(1).				GPT			
 Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1). 				GPT			
6. ☐ Ignitable or reactive waste accordance with NFPA's b 5.262(1) incorporating 40 265.201(e)(2).	uffer zone requirements - CFR 262.34(d)(3) referen	1	GPT	,			
tanks - 10 CSR 25-5.262(2)(C				GOR			
8. Wastes and residues remove properly upon closure - 10	44	1	1	l .			
262.34(d)(3) referencing 40 Cl	CSR 25-5.262(1) incorpor R 265.201(d).	rating 40 CFR	1	GPT			
262.34(d)(3) referencing 40 Cl 9. Tanks are clearly labeled or 5.262(1) incorporating 40 262.34(a)(3).	CSR 25-5.262(1) incorpore R 265.201(d). marked "Hazardous Waste	" - 10 CSR 25-	1	GPT			

w					
-	10. 🗆	Inspection of waste feed cut off, bypas stem, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c).	2	GPT	COMMENTS
	11, 🗆	Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5.	2	GPT	
		PART 2: RECORDS II	NSPE	CTION	N .
١	F. M	ANIFESTS			
	1. 🗆	Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B) or 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)1.	1	GMR	COMMENTS
	2. 🗆	Generator maintains a copy of the reclamation agreement on-site for at least 3 years after expiration of agreement - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2).	2	GMR	
	3. 🗆	Records maintained for a 3 year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	GRR	
	4. 🗆	Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1.	2	GOR	
	5. 🗆	Manifest document ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	2	GOR	
	6. 🗆	Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	2	GMR	
	7. 🗆	All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
	8. 🗆	Designated facility name, address, phone, MO & EPA I.D.#, - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
	9. 🗆	DOT shipping name, Hazard Class and waste I.D. # (RQ - if required)- 10 CSR 25-5.262(2)(B) 1 and 2.	2	GMR	
	10. 🗆	Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)B 1 and 2.	2	GMR	
	11. 🗆	Manifest signed and dated - 10 CSR 25-5.262(2)B 1.	22	GMR	
	12. 🗆	Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	2	GOR	
	13. 🗆	Manifest continuation sheets are not used - 10 CSR 25-5.262(2) (B)1 .	2	GOR	. •
	14. 🗆	Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C .	2	GRR	
	15. 🗆	Manifest summary reports and manifests sent to DNR quarterly OR annually if one shipment or no shipments are made - 10 CSR 25-5.262(2)(D)1.B and 10 CSR 25-5.262(2)(D)1.E.	2	GOR	
	16.	Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	2	GLB	
	17. 🗆	"Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	2	GLB	
	18.	number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b)(4) and (5).	2	GLB	·.
		REPAREDNESS AND PREVENTION			
	1. 🗆	Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37.	2	GPT	COMMENTS
	2 🗆	incorporating 40 CFR 262.34(d)(5)(i).	2	GSQ	
		SED OIL STORAGE			,
		Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	1	COR	None
		Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	2		
	3. 🗆	Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	2		

5	4.	Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	2			COMMENTS	
	5. 🗆	Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	2		* *		
	6. 🗆	Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	2		4.0		
	7. 🗆	Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	2				
		Mixtures of used oil and hazardous waste are properly managed - 10 CSR 25-11.279(2)(B)(2).	2			,	ž.
	1. 1 01	N-SITE BURNING					
	1. 🗆	Burn only their own used oil or used oil from DIY'ers or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a).	1			COMMENTS	
	2. 🗆	Burn only in space heaters with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	1				
		Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	1				
	J. 01	FF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS					
	1. 🗆	Used oil is transported by transporters who have obtained EPA identification numbers - 10 CSR 11.279(1) incorporating 40 CFR 279.24.	1			÷	
	(If no lic	ensed transporter is used)					
	2. 🗆	Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1)	2				
	3. 🗆	Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2).	2			45	
	4. 🗆	Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3).	2				
1	OR						
	5. 🗆	Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3).	2		_	2	
T	OR			1			
		Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c).	2				
J	K. R	ESOURCE RECOVERY					والمعتصد
_	1. 🗆	RR certification for energy recovery or reclamation of hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	1	GOR	NA	COMMENTS	
	2. 🗆	Still bottoms or RR residues disposed of property - Section 260.380.1(7) RSMo.	1	GOR	1-11-		
	3. 🗆	Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	2	GOR		COMMENTS	
	4. 🗆	Facility meets the operating conditions of certification - 10 CSR 25- $9.020(3)$.	2	GOR		O MINIELY I O	
	5. 🗆	Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1 and 2.	2	GOR			
	6. 🗆	Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6 referencing 10 CSR 25-7.264(2)(E)3.	2	GOR			
	7. 🗆	Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5 referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	2	GOR			
	8. 🗆	Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	2	GOR			

CHECKLIST KEY					
Check the 1 fin compliance.					
Circle the if not in compliance and provide comment.					
N/A = Not Applicable.	* *				
An item emphasized by a black line on the left is a serious deviation from the re	equirements (Class I violation).				
An unemphasized item is a significant deviation from the requirements (Class II	violation unless conditions warrant Class I).				
COMMENTS: INCLUDE DISCUSSION OF FACILITIES WASTE MINIMIZATION PLAN	,				
	*				
Check all Potential Multi-Media Violations and Impacts (specify and co					
APC Fugitive Dust Asbestos	PDW Taste & Odors Color				
Particulate Odors	☐ Bacteria ☐ Flow				
☐ Burning ☐ Toxics ☐ Other	☐ Pressure ☐ Toxics ☐ Other				
SWM	HW				
Open Dumps SLF	☐ Transportation ☐ USTs/LUSTs				
☐ Littering ☐ Other ☐ Waste Tire Dump	□ PCBs □ Other				
	,				
	PC				
N.O.	Sawdust Ground Water Sludge Storm Water				
☐ Treatment Plant Oper.	9ingle Family □ Other				
COMMENTS:					
*					
ì	•				
	•				
INSPERTOR'S SIGNATURE DATE					
INSPECTOR'S SIGNATURE 7/27/98					
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